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11 Attorneys for THONGXY PHANSOPHA

12 UNITED STATES DISTRICT COURT

13 EASTERN DISTRICT OF CALIFORNIA

15 THONGXY PHANSOPHA,

16 Plaintiff,

17 vs.

18 CITY OF SACRAMENTO;
19 SACRAMENTO POLICE
20 DEPARTMENT; DANIEL HAHN; and
DOES 1 to 125,

21 Defendants.

Case No.: 2:20-cv-02313-JAM-CKD

22 **STIPULATION AND REQUEST FOR
MODIFICATION OF SCHEDULING
ORDER; ORDER**

23 **TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS
24 OF RECORD:**

25 Plaintiff THONGXY PHANSOPHA ("Plaintiff"), Defendants CITY OF
26 SACRAMENTO, SACRAMENTO POLICE DEPARTMENT and DANIEL HAHN
27 (collectively "Defendants"), (hereinafter referred collectively as "the parties") by and through
28 their respective attorneys of record, hereby stipulate the following:

1. On April 12, 2021, the Court issued a Pretrial Scheduling Order in which the Court set the deadline to disclose expert witnesses and accompanying reports for August 12, 2022, and the deadline to disclose supplemental expert witnesses for September 26, 2022. (Doc. No. 8). The Pretrial Scheduling Order also sets the discovery cutoff deadline for October 26, 2022. (*Id.*)

2. The parties have met and conferred and in the interest of justice the parties have agreed that there is good cause for modification of the Pretrial Scheduling Order so that parties may thoroughly prepare the matter for trial.

3. Accordingly, the parties hereby stipulate and request the Court issue an order modifying the Pretrial Scheduling Order by continuing the expert witness disclosure date from August 12, 2022 **to September 12, 2022** and the supplemental expert witness disclosure date from September 26, 2022 **to October 28, 2022**.

4. The parties also stipulate and request the Court issue an order modifying the Pretrial Scheduling Order by continuing the date discovery is to be completed to from October 23, 2022 **to November 23, 2022.**

IT IS SO STIPULATED.

Respectfully Submitted,

DATED: August 5, 2022

SUSANA ALCALA WOOD,
City Attorney

By: /s/ MATTHEW R. DAY
MATTHEW R. DAY
Senior Deputy City Attorney

Attorneys for the Defendants, CITY OF SACRAMENTO, SACRAMENTO POLICE DEPARTMENT, and DANIEL HAHN

DATED: August 5, 2022

CESARI, WERNER AND MORIATY, PC

By: /s/ ARLEN LITMAN-CLEPER
ARLEN LITMAN-CLEPER

Attorneys for the Plaintiff
THONGXY PHANSOPHA
(as authorized on 8/5/2022)

1 **ORDER**

2 Having reviewed the parties' Stipulation and Request to Modify Scheduling Order to
3 Continue Expert Discovery Dates and completion of Discovery and GOOD CAUSE
4 appearing therefrom, it is hereby ordered that the deadline for disclosure of expert witnesses
5 be continued from August 12, 2022 to **September 12, 2022** and the deadline for disclosure of
6 supplemental expert witnesses be continued from September 26, 2022 to **October 28, 2022**.

7 Further, the date discovery is to be completed is continued from October 23, 2022 to
8 **November 23, 2022**.

9
10 **IT IS SO ORDERED.**

11
12 DATED: August 5, 2022

13 /s/ John A. Mendez

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THE HONORABLE JOHN A. MENDEZ
15 SENIOR UNITED STATES DISTRICT JUDGE

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